

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KETON HENRY,

Plaintiff,

**Rules 26 (a) (1) DISCLOSURE**  
**08-CV-3465 (BSJ) (MHD)**

THE CITY OF NEW YORK, et. al.

Defendant  
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**PLAINTIFF'S INITIAL DISCLOSURES PRIOR TO DISCOVERY**

Pursuant to Rule 26 (a)(1) of the Federal Rules of Civil Procedure, plaintiff Keton Henry, by and through his attorneys of record, provide his Initial Disclosures and states as follows:

**A. Persons Likely To Have Discoverable Information:**

- |                              |                                 |
|------------------------------|---------------------------------|
| 1. Honorable Margaret Clancy | 10. Kin Wai Fung                |
| 2. Det. Rentas               | 11. Elizabeth Vasquez           |
| 3. Det. Micheal Garrity      | 12. Jessica Archentera          |
| 4. Capt. John Vasek          | 13. Lisa Hoyas, ESQ             |
| 5. P.O Williams              | 14. Eric Mazariegas             |
| 6. Henrietta Henry           | 15. Jeff (Plaintiff's Employer) |
| 7. Rodney Evans              | 16. ADA Erica Weissberg         |
| 8. Darryle Boyd              | 17. ADA Felicity Lung           |
| 9. Shawn Riley, ESQ          |                                 |

These individuals are believed to have information regarding the circumstances underlying plaintiff's claims. All request to communicate with the plaintiff, must be direct to, and approved by, plaintiff's counsel.

Plaintiff is not aware of other persons likely to have discoverable knowledge. Plaintiff will continue its pre-trial investigation and supplement its Initial Disclosures, or respond to pre-trial discovery request, as appropriate.

**B. Potential Relevant Documents In the Custody of Plaintiff**

1. Police Reports, Grand Jury minutes, Wade hearing minutes

**C. COMPUTATION OF CATEGORIES OF DAMAGES**

1. Compensatory Damages
2. Punitive Damages

**D. The Contents Of Any Pertinent Insurance Agreement**

1. Plaintiff request that the defendants provide a complete copy of the claim submitted to Commercial Insurance under a Not-for-Profit Liability Policy not in connection with this action.

**E. Amendments**

Be advised that the responses set forth herein are made without waiving:

1. the right to the object on the grounds of competency, privilege, relevancy, materiality or any other proper ground to the use of material produces herein, for any purpose, in whole or in part, in any subsequent proceeding in this action or in any other action;
2. the right to object on any and all proper grounds, at any time, to discovery requests or other discovery procedures involving or relating to the subject matter addressed herein; and,
3. the right at any time to revise, correct, modify, supplement, or clarify, any of the responses provided herein.

Dated: Brooklyn New York  
June 11, 2008

Respectfully submitted



William T. Martin, Esq.

Attorney for Plaintiff

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